

## ENGINEERING MANAGEMENT SUPPORT INC.

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January 10, 2014

VIA: Electronic Mail

U.S. Environmental Protection Agency  
Region VII SUPR/MOKS  
11201 Renner Boulevard  
Lenexa, KS 66219

**ATTENTION:** Mr. Dan Gravatt

**SUBJECT: Monthly Status Report – December 2013**  
**West Lake Landfill Operable Unit 1, Bridgeton, Missouri**

Dear Mr. Gravatt,

On behalf of Cotter Corporation (N.S.L.), Bridgeton Landfill, LLC., Rock Road Industries, Inc., and the United States Department of Energy (the "Respondents"), Engineering Management Support Inc. (EMSI) submits the attached status report for the month of December 2013 as required by paragraph 56 of the West Lake Landfill Administrative Order on Consent, Docket No. VII-93-F-005. If you have any questions or desire additional information related to this status report or any other aspect of the project, please do not hesitate to contact me.

Sincerely,  
ENGINEERING MANAGEMENT SUPPORT, Inc.



Paul V. Rosasco, P.E.

**Distribution:**

Shawn Muenks - Missouri Dept of Natural Resources  
Victoria Warren - Republic Services, Inc.  
Ward Herst - Herst & Associates, Inc.  
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**Monthly Status Report – December 2013**  
**West Lake Landfill Operable Unit 1**  
**Bridgeton, Missouri**

This status report has been prepared by Engineering Management Support Inc. (EMSI) on behalf of Cotter Corporation (N.S.L.), Bridgeton Landfill, LLC (formerly known as Laidlaw Waste Systems [Bridgeton] Inc.), Rock Road Industries, Inc., and the United States Department of Energy (the "Respondents") for Operable Unit - 1 (OU-1) at the West Lake Landfill as required by paragraph 56 of the West Lake Landfill Administrative Order on Consent, Docket No. VII-93-F-005.

**1. Work Performed During December 2013**

**Project Planning**

A draft Core Sampling (Phase 2) Work Plan for Bridgeton Landfill – West Lake Landfill was submitted on November 15, 2013. EPA comments on the draft work plan were received on December 4, 2013. Work was performed toward preparation of Core Sampling Work Plan (Phases 1B, 1C and 2) in December. A draft of the Core Sampling (Phase 1B, 1C and 2) Work Plan was submitted to EPA and MDNR for review on December 18, 2013. EPA comments on the draft work plan were received on December 26, 2013.

Work plans for evaluation of potential impacts from a possible Subsurface Smoldering Event in Area 1 or 2 and for evaluation of potential impacts from a possible tornado impact to Area 1 or 2 were submitted to EPA and MDNR on July 24, 2013. EPA approved these work plans on July 30, 2013.

EPA comments on the various work plans prepared for the additional Supplemental Feasibility Study evaluations were received on August 16, 2013. A meeting was held with EPA and MDNR on September 24, 2013 to discuss comments on the work plans for the additional SFS evaluations. Revisions to the work plans for evaluations of alternative Area 2 depths and volumes, apatite treatment technologies and additional discount rate were prepared and submitted to EPA and MDNR on October 31, 2013.

A draft Remedial Design Work Plan was submitted to EPA in November 2008. In accordance with direction from EPA, all work on design of the ROD-selected remedy has been put on hold.

**Fieldwork - Sample Collection/Analysis**

Laboratory analyses of the fourth and last round of additional groundwater sampling were completed in December 2013. The laboratory analytical results were subjected to data validation in December 2013.

Radionuclide laboratory analytical results for new wells installed by Bridgeton Landfill, Inc. as part of its assessment of benzene occurrences in groundwater were received and subjected to data validation in December 2013.

Laboratory analytical results from additional offsite, private well sampling were also received and subjected to data validation in December 2013.

#### Report Preparation

The monthly progress report for November 2013 was prepared and submitted to EPA and MDNR on December 10, 2013.

The Groundwater Monitoring Report for the July 2013 additional groundwater monitoring event was completed and transmitted to EPA and MDNR on December 1, 2013.

#### Project Management

None.

#### Meetings

A meeting was held on December 12, 2013 at EPA Region 7 to discuss EPA comments on the draft Core Sampling (Phase 2) Work Plan.

#### Correspondence

EPA comments on the draft Core Sampling (Phase 2) Work Plan were received on December 4, 2013 and EPA comments on the draft Core Sampling (Phase 1B, 1C and 2) Work Plan were received on December 26, 2013.

## **2. Analytical Data Collected During This Reporting Period**

The final analytical report for the October 2013 groundwater sampling event was received in December 2013. Analytical reports for samples obtained from additional wells installed by Bridgeton Landfill, LLC and for samples obtained from additional offsite, private wells were received in December 2013. Due to the size of the files, these analytical laboratory reports are being transmitted separately using file transfer software.

### **3. Work Scheduled to be Performed during January and February 2014**

Validation of the analytical results associated with the fourth and last round of additional groundwater sampling will be completed in January 2014. The database will then be updated to include the validated October 2013 groundwater monitoring event.

The data report for the October 2013 additional groundwater monitoring event will be prepared. Work will also be performed toward preparation of a summary report that presents the data from the four additional groundwater monitoring events (July/August 2012, April 2013, July 2013, and October 2013) and provides interpretation of the results for the four events.

The three remaining Work Plans for the additional SFS evaluations (Partial Excavation, Alternative Landfill Cover Design, and Fate and Transport Evaluations) will be updated as necessary to address EPA and MDNR comments and the discussions at the September 24, 2013 meeting. The Respondents are awaiting guidance from EPA regarding the specific objectives for the fate and transport evaluations and the scope and approach for the partial excavation alternative evaluation.

Evaluations to estimate alternative volumes for development of a partial excavation alternative for Area 2 will be conducted.

A revised Core Sampling (Phase 1B, 1C and 2) Work Plan addressing EPA comments on the draft Core Sampling Work Plan (Phases 1B, 1C and 2) will also be prepared in January. Subject to EPA approval of the Core Sampling (Phase 1B, 1C and 2) Work Plan, field work for Phase 1B and Phase 1C will be performed.

### **4. Problems Encountered**

None.